

2 to ct
w/ prepo

ORIGINAL

(14)

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BARBARA A. WILHELM,
Plaintiff

v.

COMMONWEALTH OF PA.;
PENNSYLVANIA STATE POLICE;
COLONEL PAUL J. EVANKO,
COMMISSIONER; LIEUTENANT
COLONEL THOMAS K. COURY; and
CAPTAIN MICHAEL. D. SIMMERS,
Defendants

NO. 1:CV-01-1057

(JUDGE RAMBO)

FILED
HARRISBURG
FEB 28 2002
MARY E. D'ANDREA, CLERK
Per DEPUTY CLERK

PLAINTIFF'S CONCURRED-IN MOTION FOR AN
ENLARGEMENT OF TIME TO COMPLETE DISCOVERY

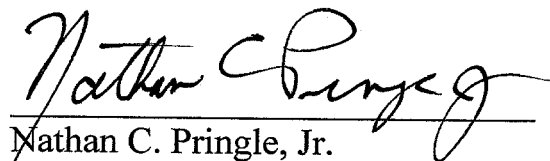
Pursuant to Fed.R.Civ.P. 6(b), Plaintiff, Barbara A. Wilhelm, by and through her attorney, Nathan C. Pringle, Jr., respectfully requests an enlargement of time of thirty (30) days, to and including March 30, 2002, to complete discovery in this action, and in support thereof, sets forth the following:

1. Discovery is scheduled to be completed by February 28, 2002.
2. Additional time is needed for the Plaintiff to prepare for depositions and develop its case.

3. Counsel for Defendants, Susan J. Forney, has no objection to this request for an enlargement, as indicated on the attached certificate of concurrence.

Wherefore, the Plaintiff, Barbara A. Wilhelm, respectfully requests an enlargement of time of thirty (30) days, to and including March 30, 2002, to complete discovery.

Respectfully Submitted,



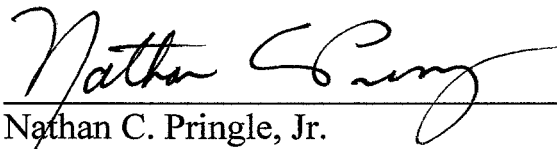
Nathan C. Pringle, Jr.
Attorney I. D. Number 30142
3601 North Progress Avenue
Suite 200
Harrisburg, PA 17110
(717) 909-8520
Attorney for Plaintiff

February 28, 2002

CERTIFICATE OF SERVICE

I, Nathan C. Pringle, Jr., hereby certify that on March 1, 2002, I caused to be hand-served a copy of the foregoing document entitled Plaintiff's Concurred-In Motion for an Enlargement of Time To Complete Discovery, upon the following:

Susan J. Forney
Chief Deputy Attorney General
Office of Attorney General
Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120


Nathan C. Pringle, Jr.

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BARBARA A. WILHELM,
Plaintiff

v.

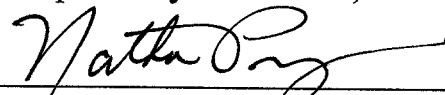
COMMONWEALTH OF PA.;
PENNSYLVANIA STATE POLICE;
COLONEL PAUL J. EVANKO,
COMMISSIONER; LIEUTENANT
COLONEL THOMAS K. COURY; and
CAPTAIN MICHAEL. D. SIMMERS,
Defendants

:
:
:
: **NO. 1:CV-01-1057**
:
: **(JUDGE RAMBO)**
:
:
:
:
:

CERTIFICATE OF CONCURRENCE

Nathan C. Pringle, Esquire, counsel for the Plaintiff, certified that on February 28, 2002, he spoke with Susan J. Forney, Esquire, counsel for Defendants, regarding an enlargement of time to complete discovery. Ms. Forney concurred in the request.

Respectfully Submitted,



Nathan C. Pringle, Jr.
Attorney I. D. Number 30142
3601 North Progress Avenue
Suite 200
Harrisburg, PA 17110
(717) 909-8520

February 28, 2002